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February 21, 2020

Via ECF

Honorable Mary Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 18C
New York, NY 10007-1312

Re: *Bouchard Transportation Co., Inc. v. Laurel Shipping LLC et al.*, 19-cv-09559-MKV—
Request for Expedited Execution by U.S. Marshal of Warrants of Arrest

Dear Judge Vyskocil:

We represent Laurel Shipping LLC (“Laurel”) in the above-captioned matter, and write to request guidance from the Court regarding the process for expediting the execution by the U.S. Marshals Service of the Warrants of Arrest, Dkt. Nos. 64-67 (the “Warrants”), which were issued by this Court on February 14, 2020, Dkt. No. 61, just three days after Laurel moved for their issuance.

The Warrants were directed to the U.S. Marshals Service and commanded the U.S. Marshal to arrest the respective Vessels and hold them pending further order of this Court. Yesterday, we were advised by the U.S. Marshal’s office for the Eastern District of New York that the Warrants may not be executed until the second week of March. *See* electronic correspondence attached hereto as Exhibit A (we have been coordinating with the EDNY Marshal’s office because the Vessels are currently located within EDNY waters)¹. A three week delay in executing the Warrants issued by this Court presents a prejudicial risk to Laurel – that the Vessels may leave the waters within this Court’s jurisdiction before the Warrants are executed, thereby evading the arrest ordered by this Court.

Laurel has provided all necessary paperwork and monetary deposits to the U.S. Marshals Service, in accordance with the Marshals’ procedures, to support the arrest and seizure of the Vessels. We have also arranged for the services of a Substitute Custodian, who, per this Court’s Order (Dkt. No. 68), will act in place of the U.S. Marshals Service as keepers for the Vessels during the pendency of their seizure. All that is required now to effect the arrest and seizure ordered by this Court is for the U.S. Marshals Service to execute the Warrants.

¹ This Court has concurrent jurisdiction over the waters within the Eastern District pursuant to 28 U.S.C. § 112(b).

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Facing a potential delay of three weeks for the execution of the Warrants, Laurel is now seeking guidance from the Court on expediting the execution of the Warrants so that the Vessels may be arrested and seized in accordance with the Order of this Court.

Laurel greatly appreciates Your Honor's attention to this matter, and is available to discuss at the Court's convenience should the Court have any questions.

Respectfully submitted,

/s/ Phillip B. Dye, Jr.

Phillip B. Dye, Jr.

Attachment

cc: All counsel of record via ECF